

On May 14, Donald B. Chester wrote:

"and urge the Commission to consider eliminating amateur subbands altogether thus allowing the amateur community to work out mode separation on its own, using voluntary band plans."

During its entire history, there have had no subbands on 160 meters. During the past 15+ years that we have had an ARRL Voluntary Bandplan, there have been continual problems with intermodal interference. As in many aspects of life, a few people may choose to ignore voluntary plans which benefit all in order to selfishly exercise their First Amendment rights. Rather than eliminating workload for the FCC, the lack of mode segmentation results in additional enforcement actions which are generally avoided on all other HF bands. The most recent example of FCC enforcement was against a group of amateurs who operated an 1823 kHz LSB net daily in the middle of both ARRL and IARU Region 2 Voluntary Bandplans for at least 17 years that I am personally aware of. Despite repeated requests to move from the narrowband segment, the group adamantly refused. Only after FCC Special Counsel Hollingsworth sent 3 enforcement letters last September 12, did the group move to a wideband area of 160 meters.

On no other amateur band below 144 MHz must amateurs constantly police intruders during the course of their daily operations in an attempt to educate, beg, or otherwise cajole their peers in an attempt to promote order. And, when we compare this fragmented, pockmarked approach to the stability and general welfare that exists on the low-end of the other HF amateur bands, it is abundantly clear which approach works and which does not. The rule of FCC law is well understood and respected by all amateurs; voluntary bandplans just do not produce the same consistency of results and we have nearly 55 years of experience with the former to draw from in making this assessment.

If the FCC does not wish to repeat the mistakes of 160 meters, and wishes to avoid needless enforcement actions of this nature, I strongly suggest you retain the simple wideband and narrowband mode segmentation that has served us well for many years on every other HF amateur band.

Sincerely,

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